STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

CASE TYPE: MISC

In Re: Wayzata Home Products, LLC

and cliqstudios.com LLC

Dudge David L. Piper

THE ASSIGNEE'S NOTICE OF

MOTION AND MOTION

TO HEAR OMNIBUS OBJECTIONS

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Assignee in the above-referenced matter, Lighthouse Management Group, Inc., ("Lighthouse" or "the Assignee"), will bring this Motion to Hear the First, Second and Third Omnibus Claim Objections ("Motion") before the Honorable David L. Piper at the Hennepin County Court, 300 South Sixth Street, Minneapolis, MN 55415, at the Court's earliest convenience. The Assignee requests that this hearing be heard remotely via Zoom. This notice will be amended when a court date has been obtained.

MOTION

Pursuant to Minnesota Statutes § 576.50, Assignee hereby moves this Court for an order granting the First, Second and Third Omnibus Objection to Claims in the above-captioned action. This Motion is supported by the legal analysis and supporting declaration of each omnibus objection, which will be filed in accordance with the Minnesota Rules of General Practice. The Motion is also based on the files, records, pleadings, and other documents previously submitted by the parties, as well as the arguments of counsel presented in written submissions, or argued at a future motion hearing.

Date: September 25, 2020 BARNES & THORNBURG LLP

By: /s/ Michael A. Cavallaro

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ACKNOWLEDGMENT REQUIRED BY MINNESOTA STATUTES SECTION 549.211, SUBDIVISION 1

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, subd. 2, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned acted in bad faith, asserted a claim or defense that is frivolous and that is costly to the other party, asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

Date: September 25, 2020 BARNES & THORNBURG LLP

By: /s/ Michael A. Cavallaro

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